

Now That You're a Certifying Officer



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We originally issued this booklet in 1983 to provide a readable desk reference for all newly appointed certifying officers. Today, our original goal remains the same. We still believe this booklet is a useful resource for newly appointed certifying officers as well as those certifying officers who have been in the position for some time. This revised version includes language on reporting large dollar transactions, and we have clarified the requirements for including taxpayer identification numbers (TINs) on payment vouchers. Like the previous version, this version is a downloadable PDF document available on the Financial Management Service (FMS) Web site.

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What is a “certifying officer”?

Ever since Congress created the Department of the Treasury (Treasury) in 1789, certain Government employees have been held accountable for Federal payments. Specific people, called “certifying officers” in civilian agencies, are responsible for verifying that payments made by the Federal Government are legal, proper, and correct. The verification involves certifying a voucher for which a disbursement will be made. As a certifying officer, you may supervise a unit within an accounting or data processing organization. In addition to ensuring that payments are legal, proper, and correct, certifying officers may spend much of their time supervising accounting or payment processing.

Why did we develop this booklet for you?

We wrote this booklet for all certifying officers in the Federal Government. It serves as a convenient introduction for those certifying officers who are new on the job and as a helpful refresher for those who are veteran certifying officers.

As a certifying officer, you are personally accountable for the correctness of Federal Government payments. You are one of nearly 1,600 certifying officers, collectively accountable for over 1 billion disbursements with a value of \$2.4 trillion each year. You have a big job!

Most of you are conscientious about your work. You are proud to be involved in the Federal Government, and you want to do your part to help it run smoothly and cost effectively. You’re sensitive to issues like fraud, abuse, waste, and mismanagement in the Federal Government. However, sometimes your role may not seem to be important. After all, you are just one person among thousands. You may think that what you do or don’t do won’t make a difference.

We prepared this booklet to assure you that you do make a difference. You are accountable for your share of the \$2.4 trillion! In the following pages, we emphasize your responsibilities as a certifying officer, which are mandated by law, and how serious the consequences may be if you do not meet those responsibilities. It is important for you to be aware of your responsibilities and to know how to meet them. We hope you will keep this booklet handy and will refer to it often.

What is “personal accountability”?

As a certifying officer, you are held personally accountable and individually responsible for verifying that the Federal Government payments under your jurisdiction are legal, proper, and correct. This is your “personal accountability.” If any payment that you have certified is found to be illegal, improper, or incorrect, you may be held individually responsible for reimbursing the Federal Government for the amount of that payment. Being held responsible to the degree that you are required to reimburse these payments is termed “pecuniary liability.”

How has personal accountability changed?

Over 200 years ago, when the Treasury Department was first established, the concept of personal accountability was simpler than it is today. In those early days of our country, Treasury disbursed all the money used to keep the Government running from one central location, Washington, DC, and most of the transactions were made in cash.

The certifying officers knew what goods were ordered and what goods were delivered. Their firsthand knowledge of transactions made accountability simple.

As the Government grew, however, the payment system became more complicated. It was no longer feasible for Treasury to disburse all payments from Washington, DC; certifying officers were needed throughout the country. Also, over the years, new laws changed and strengthened the methods available for determining that payments are legal, proper, and correct. However, the basic concept of personal accountability has remained intact.

During the second half of the 20th and into the 21st centuries, the Federal Government has grown rapidly in size and complexity. In the 1940's, vouchers documenting business transactions were processed entirely by hand. Large groups of clerks prepared and reviewed the vouchers, verified their accuracy, and compared the facts on the vouchers with those on the source documents. Then, certifying officers, who supervised these clerks, reviewed the clerks' work, and, on the basis of their reviews, certified the payments.

Today, sophisticated computer systems have automated the process that was formerly done only by individuals. For example, both accounts payable and accounts receivable are entered into central databases from multiple communication portals. The databases verify transactions, create online and output reports, and generate payment records. Certifying officers certify payments based on the amounts on the database media. However, individuals at the field offices or a computer actually determine that transactions affecting payments are legal, proper, and correct.

It is often impossible for today's certifying officers to personally review source documents and verify the facts on every payment because of the volume of payments and the complexity of today's systems. Instead, they must rely on the integrity and reliability of payment system certifications and the individuals operating them.

What is a payment system?

A payment system includes all decisions and actions that are involved in making payments with Government funds for Government activities. It begins with reviewing and processing contractual documents, reports, and invoices, and ends with the issuance of Treasury checks or electronic funds transfers.

A payment system does not include decisions to purchase, lend, hire, fire, or award Federal assistance. As a certifying officer, your involvement in a payment system occurs at the end of the payment processing cycle.

Originally, individuals completed all the steps in a payment system manually. Today, most payment systems are automated. Manual

systems and automated systems use different methods for ensuring that payments are legal, proper, and correct.

In a manual system, you work with the basic source documents. Although you can't completely determine if a payment is legal or accurate by examining the source documents, this examination does provide reasonable assurance that a transaction:

- Has been processed through all the designated responsible and authorizing officials.
- Is properly documented.
- Is computed correctly according to source documents.
- Is not improper, unreasonable, or fraudulent according to the information that is available.

The employees who initiate these source documents or sign them (not certifying officers) are the ones who actually determine that the payment is legal, proper, and correct. You certify the payment based on these signed documents. However, you usually do not escape liability for losses resulting from improper certification by claiming that you were either not in a position to personally ascertain

that each item on a voucher was correct or that you must depend on the correctness of your subordinates' work.

If you rely on the statements and the computations of subordinates, you must assume responsibility for the correctness of their statements and computations. An exception may be made if it can be shown that neither you nor your subordinates, in the reasonable exercise of care and diligence, could have known the facts.

Automated payment systems present special problems for certifying officers because you rarely examine individual payments or supporting documents. It can be difficult to determine the eligibility for certification of these payments because:

- The number of transactions is so large.
- Transactions are often system generated.
- Data originates from multiple communication portals.
- The payment file is system generated based on data received from other networks.

A well-designed automated payment system includes evidence to verify that the system was designed and is operating properly. You use this evidence to determine that payments are legal and accurate. Well-designed, automated payment systems have procedures requiring that:

- Documents are properly authorized, approved, and examined before they are transcribed into machine-readable form.
- Transcriptions are complete and accurate.
- Specifications that identify payment system requirements are consistent with current legal, security, and policy requirements. (These specifications also must specify adequate controls over inputs, processing, and outputs, and they must provide for processing all aspects of transactions properly.)
- Additions, deletions, or changes to data or computer programs are authorized and controlled.
- Equipment functions properly and operates according to preset stipulations.
- Physical access to documents and equipment is adequately restricted.

- Source data received from outside the processing departments and agencies or from other computer systems are processed according to the above criteria.

While you are still legally liable under an automated payment system, the conditions by which you may be relieved may be different from those under a manual system.

Previously, accountable officers', which include certifying officers, requests for relief from liability were sent to the Comptroller General. However, in 1991, the Department of Justice determined that certain Federal Statutes purporting to authorize the Comptroller General to issue decisions relieving accountable officers from liability were unconstitutional. See Comptroller General's Authority To Relieve Disbursing Officers From Liability [15 Op. O.L.C. 80 (August 5, 1991)]. Thus, Government Accountability Office decisions do not relieve accountable officers from legal liability. Furthermore, each agency is responsible for assessing the personal liability and obligations of its certifying officers.

Regardless of what system is used, no one has the authority to make known overpayments.



What types of payments are processed?

The Federal Government makes a wide variety of payments. For example, payments are made for employee payrolls, retirement benefits (civil service retirement, railroad retirement, social security), administrative expenses (contracts, purchase orders, travel, maintenance services, etc.), and for grants-in-aid to State and local governments and tribal organizations. Many of the systems used to make these payments can be complex, and

there is a fair amount of diversity among them.

According to law and regulations, what are your responsibilities as a certifying officer?

As a certifying officer, you are responsible for the accuracy and legality of the payments made from Federal funds that you approve. Specifically, 31 U.S.C. 3528 states that you are responsible for the following:

- Any errors in certified payments.
- The accuracy and completeness of the facts presented in certified documents for payment.
- Any illegal, improper, or incorrect payments made by the Federal Government because you have made false, inaccurate, or misleading certifications.
- Any payments made that are prohibited by law and that do not represent legal obligations under the appropriations or funds involved.

In addition, you must ensure that payments are in compliance with Executive Order 13224, Blocking Property and Prohibiting Transactions With Persons Who

Commit, Threaten To Commit, or Support Terrorism, and other applicable sanctions programs administered by the Department of the Treasury's Office of Foreign Assets Control.

However, 31 U.S.C. 3528 also states that you are not required to make good on payments you certified if you:

- Based your certifications on official records, and you did not know, and by reasonable diligence and inquiry, could not have discovered, the correct information; or
- The obligation was incurred in good faith, no law specifically prohibited the payment, and the U.S. Government received value for payment.

In addition to the above, you must exercise due diligence in collecting the funds at issue.

Federal agencies should limit the use of the same-day payment process, "Fedwire," to large dollar payments. In accordance with Treasury Financial Manual Volume I, Part 6, Chapter 8500, in the event of a large dollar disbursement, the certifying officer is responsible for



submitting a Large Dollar Notification (LDN) to FMS's Cash Forecasting Division.

31 U.S.C. 3325(d), further clarifies the certifying officer's responsibility by stipulating that each certified voucher submitted to a disbursing official should include the taxpayer identification number (TIN) of each person to whom payment may be made under the voucher. TINs on payment vouchers are not required under the following circumstances:

- Where an agency does not have the statutory or legal authority to require a Federal payee to submit a TIN and the agency has no other means of obtaining it;
- Where a Federal payment recipient is unable to obtain a TIN;

- Where the collection or provision of a TIN has a detrimental effect on a law enforcement operation, military operation, national security, or an emergency relief effort;
- Where the agency does not expect to make more than one payment, in an amount of \$200 or less, to the same recipient within a 1-year period (that is, the payment is nonrecurring) and the cost of obtaining a TIN would be prohibitive; or
- Where FMS determines that the collection or provision of a TIN is not in the best interest of the Government.

Certifying officers must also comply with Executive Order 13520 entitled Reducing Improper Payments dated November 20, 2009. This guidance was issued for the purpose of reducing “improper” payments by intensifying the efforts to eliminate payment error, waste, fraud, and abuse in the major programs administered by the Federal Government. Guidance for this order can be found in Treasury Financial Manual, Volume I, Part 4, Chapter 2100, “Submitting Required Improper Payments Information for Publication on the PaymentAccuracy.gov Web Site.”

What should you do in carrying out your responsibilities to avoid liability?

Certifying officers have a heavy burden of verification in order to avoid liability or to qualify for relief. Therefore, in carrying out your responsibilities, you should do the following:

- Properly supervise subordinates by establishing a system of procedures and controls that minimize opportunities for incorrect or improper payments and ensure that the system is followed.
- Be alert to the possibility of voucher schedules and supporting documents being processed a second time.
- Make use of the evidence that is available, for example, fund availability certifications and other documentation that would indicate procedural safeguards regarding payments have been observed.
- Return payment vouchers that are inadequately documented to the appropriate administrative officials for proper approvals and supporting documents.

- Never authorize payments when funds are not available to cover the payments.
- Do not sign blank voucher forms.



***According to the law,
what can happen to you
if you are negligent in
performing your job?***

Certifying officers are among the employees involved in the payment process who are required to make good any payments that are illegal, inaccurate, or improper.

If an outstanding liability remains as a result of a loss for which the certifying officer is liable, and a request for relief is denied, the certifying officer becomes indebted to the United States for the amount involved. At this point, the agency can initiate collection action against the person in accordance with the law. If the person is still employed by the Government, the means of collection is mandatory withholding of pay.

In addition, the Civil Service Reform Act of 1978 states that "...employees should be separated who cannot or will not improve their performance to meet required standards." In another section, the Act states that employees may be reduced in grade or removed if their job performance is unacceptable.

Conclusion

You have an extremely responsible position. Payments that you certify must be correct, proper, and legal. You are personally accountable and have pecuniary liability for payments that you certify.

The increasing complexity of the payment process and the

development and enhancement of automated payment systems have changed the infrastructure of your job, but they have not relieved you of your responsibility. Therefore, it is important that you stay abreast of your responsibilities as a certifying officer and changes in the area of “electronic certification.”



Questions

Please use the following questions to check your knowledge of the information in this booklet. Circle the right answer and check your accuracy on page 15. For every question answered incorrectly, please review the section indicated with the answer.

1. What is personal accountability?

- A. Being held individually responsible for verifying that all payments under your jurisdiction are legal, correct, and proper.
- B. Being held individually responsible for reimbursing the Government when your supervisor makes errors.
- C. Being held responsible for reimbursing the Government if an incorrect payment is made because of computer malfunction.

2. What is pecuniary liability?

- A. Being individually responsible for reimbursing the Government for any payment you certified that is found to be illegal, improper, or incorrect.
- B. Being responsible for reporting malfeasance to your supervisor.
- C. Being responsible for individually supervising the work of field officers.

3. Who and what must today's certifying officer rely on to determine that transactions are legal, proper, and correct?

- A. Interviews with field officers and personal reviews of every source document.
- B. People who service computers and computer manuals.
- C. Individuals in field offices and the payment systems they help operate.

4. Automated payment systems present special certification problems because:

- I. The number of transactions is so large.*
- II. There are so many locations initiating transactions.*
- III. Transactions are entered from remote terminals.*
- IV. Data are transferred through telecommunications networks and central computer processing.*

- A. None of the above is true.
- B. All of the above are true.
- C. I and II are true.
- D. II and IV are true.

5. The basic issue in determining your legal liability in an automated payment system is:

- A. How long you have worked as a certifying officer.
- B. Your ability to pay.
- C. Whether it was reasonable for you to rely on the system to continually produce legal and accurate payments.

6. According to the law, two conditions under which you are not required to make good on payments you have certified are:

- I. You based your certification on official records and did not know, and by reasonable diligence and inquiry could not have discovered, the correct information.*
- II. You knew that your work would be double-checked by others.*
- III. The obligation was incurred in good faith, no law specifically prohibited the payment, and the U.S. Government received value for payment.*
- IV. You gave blanket approval to the people you supervise to proceed with payments.*

- A. I and II are true.*
- B. II and IV are true.*
- C. I and III are true.*
- D. I and IV are true.*

7. According to the law, a certifying officer is responsible for the following:

- I. Any errors in certified payments.*
- II. The accuracy and completeness of the facts in certified documents for payment.*
- III. Reporting any errors to the local Congressman or Congresswomen.*
- IV. Any payments made that are prohibited by law and that do not represent legal obligations under the appropriations or funds involved.*

- A. All of the above are true.*
- B. None of the above is true.*
- C. I and II are true.*
- D. I and IV are true.*

8. To carry out your responsibilities and avoid liability, there are several things you should do. These include:

- I. Never sign blank voucher forms.*
- II. Never authorize payments when funds are not available to cover the payments.*
- III. Be alert to the possibility of vouchers or voucher schedules and supporting documents being processed a second time.*

- A. All of the above are true.
- B. None of the above is true.
- C. Only I and II are true.

9. True or False: Certifying officers are the only individuals involved in the payment process who are required to make good on payments that are illegal, inaccurate, or improper.

- A. True
- B. False

10. A well-designed automated payment system has procedures that require that:

- I. Transcriptions are complete and accurate.*
- II. Physical access to documents and equipment is open to all.*
- III. Additions, deletions, or changes to data or computer programs are authorized and controlled.*
- IV. System-generated documents are randomly audited to ensure accuracy.*

- A. I and II are true.
- B. II and IV are true.
- C. III and IV are true.
- D. I and III are true.



Answers

1A. Correct.

1B. Wrong. Review the section entitled, "What is personal accountability?"

1C. Wrong. Review the section entitled, "What is personal accountability?"

2A. Correct.

2B. Wrong. Review the section entitled, "What is personal accountability?"

2C. Wrong. Review the section entitled, "What is personal accountability?"

3A. Wrong. Review the section entitled, "How has personal accountability changed?"

3B. Wrong. Review the section entitled, "How has personal accountability changed?"

3C. Correct.

4A. Wrong. Review the section entitled, "What is a payment system?"

4B. Correct.

4C. Wrong. Review the section entitled, "What is a payment system?"

4D. Wrong. Review the section entitled, "What is a payment system?"

5A. Wrong. Review the section entitled, "What is a payment system?"

5B. Wrong. Review the section entitled, "What is a payment system?"

5C. Correct.

6A. Wrong. Review the section entitled, "According to the law and regulations, what are your responsibilities as a certifying officer?"

6B. Wrong. Review the section entitled, "According to the law and regulations, what are your responsibilities as a certifying officer?"

6C. Correct.

6D. Wrong. Review the section entitled, "According to the law and regulations, what are your responsibilities as a certifying officer?"

- 7A. Wrong. Review the section entitled, "According to the law and regulations, what are your responsibilities as a certifying officer?"
- 7B. Wrong. Review the section entitled, "According to the law and regulations, what are your responsibilities as a certifying officer?"
- 7C. Wrong. Review the section entitled, "According to the law and regulations, what are your responsibilities as a certifying officer?"
- 7D. Correct.**
-

- 8A. Correct.**
- 8B. Wrong. Review the section entitled, "What should you do in carrying out your responsibilities to avoid liability?"
- 8C. Wrong. Review the section entitled, "What should you do in carrying out your responsibilities to avoid liability?"

- 9A. Wrong. Review the section entitled, "According to the law, what can happen to you if you are negligent in performing your job?"
- 9B. Correct.**
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- 10A. Wrong. Review the section entitled, "What is a payment system?"
- 10B. Wrong. Review the section entitled, "What is a payment system?"
- 10C. Wrong. Review the section entitled, "What is a payment system?"
- 10D. Correct.**
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***Our representatives
are ready to answer
your questions.***

Please contact:

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